

**REMARKS**

**I. Status of the Claims**

Claims 1-24 and 28-35 are pending in the application. Claims 1, 6, 17, 21, 28, 30 and 33 are amended herein. Claims 2, 25, 26 and 27 have been canceled. No new claims, and no new matter, have been added.

**II. Summary of the Office Action and this Reply**

Claims 1-7 stand rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,230,196 to Guenthner et al. ("Guenthner") in view of U.S. Patent No. 6,085,199 to Rose ("Rose"). Claims 8-10 stand rejected under § 103(a) as unpatentable over Guenthner in view of Rose and further in view of Airth, "Navigation in Pop-up Menus." Claims 11-14 stand rejected under § 103(a) as unpatentable over Guenthner in view of Rose and Airth, and further in view of U.S. Patent No. 5,706,502 to Foley et al. ("Foley"). Claims 15-24 and 28-35 stand rejected under § 103(a) as unpatentable over Guenthner in view of Rose and Foley.

The Examiner is thanked for the telephone interview held with the undersigned on September 25, 2003.

**III. Discussion of the Cited Art**

**U.S. Patent No. 6,230,196 to Guenthner**

Guenthner discloses a method for dynamically creating a Web page at a Web server in response to an HTTP request from a Web client. The Web page has a hypertext reference identifying a linked page. The linked page may be supported on

multiple distinct servers, and therefore may be retrieved using one of several different electronic addresses. In response to the HTTP request, a given one of the distinct servers is identified/selected based on given criteria. One of the electronic addresses identifying a path to the selected server is then inserted into the hypertext reference of the Web page. The Web page, including the inserted electronic address, is then returned to the client in response to the request. Thus, if the hyperlink is later activated by the user browsing the returned Web page, the linked page is served from the selected other server using the single inserted electronic address. Col. 2, lines 9-23.

**U.S. Patent No. 6,085,199 to Rose**

Rose discloses a method for distributing a file in a plurality of different file formats. More specifically, Rose discloses displaying a web page in which multiple hyperlinks are presented. See Rose, Figure 3. Each hyperlink is associated with a single file in a certain format. In accordance with the teachings of Rose, not all of the files listed via the hyperlinks are actually stored on the server. Rather, some files for which hyperlinks are displayed may be created on an "as needed" basis, thereby reducing the number of files that would otherwise be needed to be stored on the server. Rose, col. 4, lines 40-67.

**IV. Response to 103 Rejections**

In paragraphs 5-8 of the Action, the Examiner rejected claims 1-24 and 28-35 under 35 U.S.C § 103(a).

To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Additionally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP § 2143.

**Claims 1-24 and 28-35**

A traditional hyperlink is associated with a single electronic address (e.g. URL) of a particular linked file. The association is between: (1) the hyperlink displayed by the browser; and (2) the electronic address that is in the parent/source file (e.g. in the HTML coding) that is resident at the client and interpretable by the client's web browser to display the web page (including the hyperlink) at the client computer, etc, as known in the art. See application, page 2, lines 3-13.

The present invention provides a computer-implemented method and apparatus for providing a logical point of access to multiple files. The single logical point of access is referred to as a "multilink," which appears in a web page displayed by a web browser in the form of a traditional hyperlink. Application, page 6, line 24- page 7, line 1. In contrast to a traditional hyperlink, a multilink is associated with a plurality of electronic addresses of the particular linked file(s) (e.g. URLs). The plurality of electronic addresses are included in the parent/source file (e.g. in the HTML coding) that is resident at the client and interpretable by the client's web browser to display the web page including the multilink at the client computer, etc. By accessing the single hyperlink (multilink) displayed in a browser, a user can then

access any one of multiple files having electronic addresses associated with that multilink in the parent/source file interpretable to display the multilink. A selected one of the multiple electronic addresses from that file, which is present at the client device, is used to access a certain one of the corresponding files.

Independent claim 1 is directed to a method of operation of a client computer in which a multilink is displayed at the client computer as a hyperlink. The multilink provides a logical point of access to a plurality of files. Claim 1 is amended herein to recite that each of the plurality of files has a respective unique electronic address, that each of the electronic addresses is associated with the multilink, and that each of the electronic addresses is contained in a file at the client computer. The file referenced is the file that is interpretable to display the multilink. Accordingly, a single hyperlink (the multilink) appearing in a browser at the client's computer is associated with multiple electronic addresses appearing in the file at the client computer that is interpretable to display the hyperlink. Each of these electronic addresses in the file at the client computer can then be used in a request for any one of those files, and that request is initiated by selection of a single hyperlink (the multilink) that can be used to access any one of those files. A user selected file can be selected from a menu of options displayed after selection of the multilink. Accordingly, a multilink to multiple files is displayed, when the multilink is selected a menu of options is displayed, and any one of several files can be accessed upon selection of a corresponding option from the menu. In this manner, a single hyperlink (the multilink) appearing in a browser serves as a logical point of access to multiple files.

The cited references fail to teach or suggest the claimed invention, in which a plurality of electronic addresses are contained in a file at the client computer that is interpretable to display a multilink-type hyperlink, each of those addresses being associated with a single multilink-type hyperlink. Guenthner does not disclose a hypertext reference that links to a plurality of files having different network addresses. Guenthner discloses only that a single file may contain a hypertext reference that links to any one of a plurality of files having different network addresses. More specifically, Guenthner teaches creating a web page "on the fly" to include an "up-to-date" electronic address in a web page source file for displaying a hyperlink. According to Guenthner, the one best electronic address for a file at the time of the HTTP request from a client is identified/selected and inserted in the source file before the source file is transmitted to the client in response to the request. Col. 2, lines 14-21; col. 2, lines 49-53; col. 4, lines 41-52; col. 6, line 65 - col. 7, line 1; col. 4, lines 15-24. This is performed at the server 44 by a generator 45. Figure 3; col. 4, line 66- col. 5, line 5.

According to Guenthner, the web page source file at the client computer is like any conventional Web page source file in that it contains a single conventional electronic address associated with a single conventional hyperlink. This causes clutter in web pages by causing a distinct hyperlink to be displayed for each linked file. According to Guenthner, the web page source file never contains more than one electronic address that is associated with a single hyperlink, contrary to the present invention.

In the present invention, the multilink (displayable by a web browser) is a single hyperlink that is associated with a plurality of electronic addresses contained in a source file (which is the file interpretable by the web browser to display the multilink). It is these electronic addresses (and the corresponding files) that are accessible via the single multilink. The source file is therefore resident at the client computer when the multilink is displayed and includes multiple electronic addresses that are associated with the multilink-type hyperlink. This reduces clutter in a web page by allowing access to these files via the single multilink, rather than via a hyperlink for each electronic address. Claim 1 has been amended to clearly recite this relationship.

Rose teaches presenting a web page displaying multiple hyperlinks for a single file stored on a web server, and creating files "on the fly" to provide information in various formats, etc. This causes a greater number of hyperlinks to be displayed via web pages relative to the number of files stored on a web server. This results in web pages excessively populated with hyperlinks, i.e. "cluttered" web pages, and is contrary to the present invention, which teaches presenting a web page displaying a single hyperlink (namely, the multilink), for multiple files stored on a web server. Compare Figures 2A and 2B; page 9, lines 23-26.

Neither Guenther nor Rose provide any teaching or suggestion of the invention of claim 1, in which each of the plurality of files accessible by a single multilink has a respective unique electronic address contained in a file at the client computer that is interpretable to display the multilink.

For at least these reasons, independent claim 1, and dependent claims 3-16 are patentable. Independent claims 17, 21, 28, 30 and 33, and all claims depending therefrom, are patentable for similar reasons. Reconsideration and withdrawal of the rejections of claims 1, 3-24 and 28-35 is therefore respectfully requested.

**Claims 5, 6, 8, 11-14, 17, 21, 28 and 30**

In addition to the discussion above, it is noted that claims 5, 6, 8, 11-14, 17, 21 and 28-32 recite additional features that are neither taught nor suggested by the cited references. For example, claim 5 requires that the multilink be associated with a multilink URL in the source file that comprises multiple concatenated electronic addresses. Application, page 7, lines 10-17; and page 9, lines 3-21. Claims 11-14, 28 and 30 have similar recitations. Claim 6 further recites parsing, at the client computer, of the plurality of electronic addresses of a single multilink URL. Claims 28 and 30 have similar recitations. As discussed above, the cited art fails to disclose multiple electronic addresses in a file at the client computer that correspond to a single hyperlink.

Claim 8 requires a pop-up menu of options that no more than partially obscures a web page containing the multilink, which contributes to the reduction of cluttered web pages. See Figure 2B; page 10, lines 23-26. The web page of Rose containing multiple hyperlinks is not analogous to the menu of the present invention. Rose's "directory" function to cause display of multiple hyperlinks for a single native file is performed before display of the web page, or as part of the initial display of the web page. In contrast, the claimed invention requires generation and display of a

menu of options after selection of a multilink, and therefore after the initial display of the web page containing the multilink, and displaying such a menu superimposed over such a web page.


For these additional reasons, reconsideration and withdrawal of the rejection of claims 5, 6, 8, 11-14, 17, 21 and 28, 30, and all claims depending therefrom, is respectfully requested.

### **CONCLUSION**

In view of the foregoing amendments and remarks, Applicants believe claims 1, 3-24 and 28-35 to be patentable and the application in condition for allowance. Applicants respectfully request issuance of a Notice of Allowance. If any issues remain, the undersigned request a telephone interview prior to the issuance of an action.

Respectfully submitted,

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